

**STATE OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of)	
Telecommunications and Energy on Its Own)	
Motion To Implement the Requirements Of)	DTE. 03-60
The Federal Communications Commission's)	
Triennial Review Order Regarding Switching)	
For Mass Market Customers)	

**CONVERSENT COMMUNICATIONS OF MASSACHUSETTS, LLC'S SECOND SET
OF INTERROGATORIES TO BROADVIEW**

Conversent Communications of Massachusetts, LLC ("Conversent") hereby requests that Broadview respond fully to each of the following interrogatories based on all information that is in its possession, custody or control, including that information which is in the constructive possession of Broadview. Conversent requests that Broadview produce responses to these interrogatories in the offices of Conversent, 222 Richmond Street, Suite 301, Providence, RI 02903 within seven (7) days of the date of service of these interrogatories.

DEFINITIONS

1. "Affiliate" means "a person or entity that directly or indirectly owns or controls, is owned or controlled by, or is under common ownership or control with, another person or entity. For purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1). Conversely, "Unaffiliated" means a person or entity that does not meet the definition of Affiliate.
2. "Broadview", "you" and "your" mean Broadview and any other person or entity acting on its behalf, including, but not limited to, its attorneys, agents, investigators, clerks, experts, representatives, consultants and other related corporate entities and affiliates.

GENERAL INSTRUCTIONS

You are instructed to respond to the set interrogatories fully and completely. The words "and" and "or" as they are used in these interrogatories shall be interpreted in the conjunctive to require responses to all sub-parts and all categories within each interrogatory. With respect to each interrogatory, all information is to be divulged which is in your possession, custody, or control, including that information which is in your constructive possession. When an interrogatory calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable. You are also under a continuing duty to amend prior discovery responses if you obtain information which renders a discovery response incorrect when made, or if said response was correct when made, but is no longer correct in light of new or additional information.

INTERROGATORIES

CONV-BVIEW 2-1: Does Broadview offer DS-3 dedicated transport at wholesale over its own facilities for any of the routes listed below?

Wire Center 1	Wire Center 1 Name	Wire Center 2	Wire Center 2 Name
SPFDMAWO	Springfield	HLYKMAMA	Holyoke

Dated: December 15, 2003

Scott Sawyer
Vice President, Regulatory
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